

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

**Amendment 2 - Case 1:23 – cv-01822-JRR**

Jeffery Battle,  
Battle Enterprises, LLC  
(Plaintiff)

-Vs-

Microsoft Corporation  
(Defendant)

Complaint for a Civil Case  
Case No. 1:23 – cv-01822-JRR  
Jury Trial: X Yes  No

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The Parties to This Complaint A. The Plaintiff (Individual).

8314 Pigeon Fork Ln  
Laurel, Maryland, 20724  
(301) 613-6104  
[jefttl@hotmail.com](mailto:jefttl@hotmail.com)

The Parties to This Complaint B. The defendant (Organization).

1 Microsoft Way  
Redmond, Washington, 98052  
(425) 882-8080  
[buscond@microsoft.com](mailto:buscond@microsoft.com), [daniel@bing.com](mailto:daniel@bing.com)

**RE: Amendment 2; additional information; Case (1:23 – cv-01822-JRR) Judge Julie  
Rebecca Rubin**

The purpose of this (Amendment 2) to the complaint is to provide additional information, context, and criticism in support of the original complaint alleging Assault, Libel, and Slander, against defendant Microsoft. Additionally, Microsoft is alleged to be responsible for damages for Intentional Torts, Negligent Torts, and Strict Liability Torts in accordance with established federal and state laws and case precedence.

The defendant is alleged to be negligent and is responsible for damages from Negligence Tort and Strict Liability Torts, by deploying faulty software products and the harm caused to Plaintiff from the Artificial Intelligence (AI), Bing Search, and Chat. They owed a duty of reasonable care to the Plaintiff, and it is alleged that they did not behave in a reasonable manner to demonstrate care with the deliberate incorporation of faulty Artificial Intelligence (AI) programs into its new 2023 Bing Search and Chat offerings, that is widely known to have the potential to harm humans. Microsoft is alleged to be responsible for damage as allowed under Strict Liability Torts due to the deployment of faulty software products and harm caused to Plaintiff from the Artificial Intelligence (AI), Bing Search, and Chat.

Microsoft's misinformation, with Microsoft's Bing and Chat features, is facilitated by Artificial Intelligence that is initially and continuously being programmed or reprogrammed by humans. Microsoft is alleged to be responsible for Intentional Tort because it attached information for the purpose of labeling Plaintiff as a terrorist, to several very unique identifications of Plaintiff, as an individual, as an honorable discharged and 100% service-disabled U.S. Air Force veteran, President, and Chief Executive Officer (CEO) and owner of Battle Enterprises, LLC and its subsidiary, The Aerospace Professor Company,

author of an autobiography entitled “The Aerospace Professor: The Man and The Brand, journalist, and facilitator of an E-commerce Store.

In several instances and unique situations, the label terrorist was associated with Plaintiff, as an individual, as an honorable discharged and 100% service-disabled U.S. Air Force veteran, President, and Chief Executive Officer (CEO) and owner of Battle Enterprises, LLC and its subsidiary, The Aerospace Professor Company, and author of an autobiography entitled “The Aerospace Professor: The Man and The Brand, and facilitator of an Ecommerce Store; all have been falsely associated with terrorism.

Microsoft’s Bing Chat feature, when asked “What is a terrorist” stated, “Terrorism is the use of intentional violence and fear to achieve political or ideological aims. It is usually carried out by political organizations with both rightist and leftist objectives, by nationalistic and religious groups, by revolutionaries, and even by state institutions such as armies, intelligence services, and police. The term “terrorist” refers to a person who uses unlawful violence and intimidation, especially against civilians, in the pursuit of political aims.”

The alleged assault is based on Microsoft’s intentional actions to label Plaintiff and his interest as terrorists, in various different ways, while exposing his personal information in new and unique ways. The defendant’s actions made Plaintiff afraid and his fear is reasonable. His fear of battery against him and his immediate family was developed by being falsely labeled a terrorist by the defendant. The average person would be fearful of a battery, on several levels, if they were under the same circumstances as being falsely labeled a Terrorist.

Labeling Plaintiff and his interests as Terrorists owned continues to spread over the internet, in print, and in broadcasts, and is likely to continue to spread by other means in perpetuity. Microsoft’s Bing Chat feature, when asked “How does misinformation travel faster on the internet” the response was; “Hello, this is Bing. According to several studies, misinformation travels faster on the internet because people are more likely to share it than the truth, especially if it is novel, emotional, or polarizing...”

Plaintiff suffered multiple injuries from alleged Assault, Libel & Slander, Intentional Torts, Negligent Torts, and Strict Liability Torts. The relief sought includes monetary and other damages and is not limited to Emotional Distress, Property Damage, and others as previously stated in the original complaint. Microsoft did not behave in a reasonable manner to demonstrate care by falsely labeling Plaintiff and his interests as terrorists.

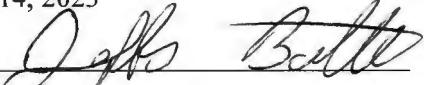
### **Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### **For Parties Currently Without an Attorney**

I agree to provide the Clerk’s Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk’s Office may result in the dismissal of my case.

Date of Signing: August 14, 2023

Signature of Plaintiff: 

Printed Name of Plaintiff: Jeffery Battle